

WEIL, GOTSHAL & MANGES LLP

Richard W. Slack (*pro hac vice*)
(richard.slack@weil.com)

Jessica Liou (*pro hac vice*)
(jessica.liou@weil.com)

Matthew Goren (*pro hac vice*)
(matthew.goren@weil.com)

767 Fifth Avenue

New York, NY 10153-0119

Tel: (212) 310-8000

Fax: (212) 310-8007

KELLER BENVENUTTI KIM LLP

Jane Kim (#298192)

(jkim@kbbkllp.com)

David A. Taylor (#247433)

(dtaylor@kbbkllp.com)

Thomas B. Rupp (#278041)

(trupp@kbbkllp.com)

425 Market Street, 26th Floor

San Francisco, CA 94105

Tel: (415) 496-6723

Fax: (650) 636 9251

*Attorneys for the Debtors and Reorganized
Debtors*

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric
Company
☒ Affects both Debtors

** All papers shall be filed in the Lead
Case, No. 19-30088 (DM).*

LATHAM & WATKINS LLP

Joshua G. Hamilton (#199610)

(joshua.hamilton@lw.com)

Michael J. Reiss (#275021)

(michael.reiss@lw.com)

10250 Constellation Blvd., Suite 1100

Los Angeles, California 90067

Tel: 424 653 5500

LATHAM & WATKINS LLP

James E. Brandt (*pro hac vice*)

(james.brandt@lw.com)

1271 Avenue of the Americas

New York, NY 10020

Tel: 212 906 1200

Bankruptcy Case No. 19-30088 (DM)

Chapter 11

(Lead Case) (Jointly Administered)

**DECLARATION OF ROBB MCWILLIAMS
IN SUPPORT OF REORGANIZED
DEBTORS' THIRTY-FOURTH
SECURITIES CLAIMS OMNIBUS
OBJECTION TO CLAIMS ADOPTING
RKS AMENDMENT**

1 I, Robb McWilliams, pursuant to section 1746 of title 28 of the United States Code, hereby
2 declare under penalty of perjury that the following is true and correct to the best of my knowledge,
3 information and belief:

4 1. I am a Partner and Managing Director at the firm of AlixPartners, LLP
5 (“**AlixPartners**”), which is an affiliate of both AlixPartners, LLC and AP Services, LLC (“**APS**”).
6 APS was previously retained to provide interim management services to PG&E Corporation and
7 Pacific Gas and Electric Company, as debtors and reorganized debtors (collectively, “**PG&E**,” the
8 “**Debtors**,” and as reorganized pursuant to the Plan, the “**Reorganized Debtors**”) in the above-
9 captioned chapter 11 cases (the “**Chapter 11 Cases**”). I submit this Declaration in support of the
10 *Reorganized Debtors’ Thirty-Fourth Securities Claims Omnibus Objection To Claims Adopting*
11 *RKS Amendment* (the “**Omnibus Objection**”), filed contemporaneously herewith.¹

12 2. In my current position, I am responsible for overseeing the bankruptcy case
13 management component of AlixPartners’ assignment to assist the Reorganized Debtors with
14 various matters related to these Chapter 11 Cases. My areas of responsibility include (a) the effort
15 by AlixPartners, in coordination with the Reorganized Debtors, to review and assess the validity
16 of all claims asserted against the Debtors, other than Fire Claims and Subrogation Wildfire Claims,
17 and (b) providing support with respect to Securities Claims. I am generally familiar with the
18 Reorganized Debtors’ day-to-day operations, financing arrangements, business affairs, and books
19 and records. Except as otherwise indicated herein, all facts set forth in this Declaration are based
20 upon my personal knowledge, the knowledge of other AlixPartners professionals working under
21 and alongside me on this matter, my discussions with the Reorganized Debtors’ personnel and the
22 Reorganized Debtors’ various advisors and counsel, and my review of relevant documents and
23 information. If called upon to testify, I would testify competently to the facts set forth in this
24 Declaration. I am authorized to submit this Declaration on behalf of the Reorganized Debtors.

25 3. The AlixPartners team under my supervision has been actively and intimately
26 involved in the claims review and reconciliation process. AlixPartners initially assisted the Debtors

27
28 ¹ Capitalized terms used but not otherwise defined herein have the meanings ascribed to such terms
in the Omnibus Objection.

1 in the preparation of their bankruptcy schedules based on the Debtors' books and records.
2 AlixPartners is now supporting, and will continue to support, the efforts of the Reorganized
3 Debtors and their counsel to resolve disputed claims, including by formal objections as necessary.

4 4. As part of the claims review and reconciliation process, the AlixPartners team,
5 working with the Reorganized Debtors' personnel and other professionals, identified a number of
6 proofs of claim that adopt, in whole or in part, the Amended Statement of Claim filed by the law
7 firm of Rolnick Kramer Sadighi LLP ("RKS") on behalf of the RKS claimants. In addition, the
8 AlixPartners team coordinated with Kroll Restructuring Administration LLC and identified certain
9 of those claimants that held one or more Utility Senior Notes (as defined in Section 1.246 of the
10 Plan) at the time of both the Petition Date and the Effective Date. The identification of these
11 claimants is discussed at greater length in the Ferrante Declaration filed herewith.

12 5. The Omnibus Objection is directed to the claims identified in Exhibit A attached
13 to the Omnibus Objection, in the column headed "Claims to Be Disallowed and Expunged."
14 Exhibit A to the Omnibus Objection was prepared by the AlixPartners team under my overall
15 supervision, and I am familiar with the document, its contents, and the process under which it was
16 prepared.

17 Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true
18 and correct to the best of my knowledge, information, and belief.

19
20 Executed December 13, 2023 in Dallas, Texas.

21
22 /s/ Robb McWilliams
23 Robb McWilliams
24 Partner and Managing Director
25
26
27
28